

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:24-cv-00629-CCE-JLW**

KENYA TEASLEY,

Plaintiff,

v.

**TYLER TECHNOLOGIES, INC.; and
ABIGAIL DIAZ,**

Defendants.

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Pursuant to Local Rules 6.1(a) and Rule 6(b) of the Federal Rules of Civil Procedure, Defendants Tyler Technologies, Inc. ("Tyler Technologies") and Abigail Diaz (collectively, "Defendants"), move this Court for a 16-day extension of time, through and including September 13, 2024, to answer or otherwise respond to Plaintiff's Complaint. In support of this motion, Defendants state the following:

1. Plaintiff filed the Complaint on July 26, 2024.
2. Plaintiff served the summons and Complaint on Defendant Tyler Technologies, Inc.'s registered agent via FedEx on August 7, 2024. Plaintiff served the summons and Complaint on Defendant Abigail Diaz at her Maine office via FedEx on August 7, 2024. Proper service on this date would result in a response date of August 28, 2024.

3. The time within which Defendants must answer or otherwise respond to the Complaint has not expired.

4. Defendants request that the deadline to respond to the Complaint be extended by 16 days, to and through September 13, 2024. Such an extension of time will allow Defendants time to investigate the allegations of the Complaint and facilitate a more efficient response.

5. Tyler Technologies offered to waive service pursuant to Federal Rule of Civil Procedure 4(d), but Plaintiff declined Tyler Technologies' offer. Had Plaintiff not rejected Tyler Technologies' offer to waive service, Tyler Technologies would have had 60 days—up to and including October 6, 2024—to respond to the Complaint under Rule 12(a)(1)(A).

6. This Motion is made in good faith and not for the purpose of undue delay.

7. Defendants' counsel has conferred with the Plaintiff, and Plaintiff does not consent to the requested extension.

8. Defendants expressly reserve all defenses, claims, and arguments, including for lack of jurisdiction. In making this motion, Defendants do not waive any arguments and do not consent to jurisdiction.

WHEREFORE, Defendants respectfully request the Court extend by 16 days Defendants' deadline to answer or otherwise respond to the Complaint, through and including September 13, 2024.

This 13th day of August, 2024.

s/ Gregory L. Skidmore
Gregory L. Skidmore
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P.A.**

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*Attorney for Defendants Tyler
Technologies, Inc. and Abigail Diaz*

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing has been served on Plaintiff by depositing the same in the United States mail, postage prepaid, in an envelope addressed as follows:

Kenya Teasley
100 Tobler Court
Apartment 205
Durham, North Carolina 27704

This 13th day of August, 2024.

s/ Gregory L. Skidmore
Gregory L. Skidmore